

2023-1039

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

MID CONTINENT STEEL & WIRE, INC.,
Plaintiff-Appellee

v.

UNITED STATES,
Defendant

OMAN FASTENERS, LLC,
Defendant-Appellant

Appeal from the United States Court of International Trade in No. 1:15-
cv-00214-MAB, Chief Judge Mark A. Barnett

OPPOSITION TO MOTION TO RESCHEDULE HEARING

Adam H. Gordon
Jennifer M. Smith
THE BRISTOL GROUP PLLC

Dated: October 21, 2024

*Counsel to Defendant-Appellee Mid
Continent Steel & Wire, Inc.*

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT****CERTIFICATE OF INTEREST****Case Number** 23-1039**Short Case Caption** Mid Continent Steel & Wire, Inc. v. US**Filing Party/Entity** Mid Continent Steel & Wire, Inc.

Instructions: Complete each section of the form. In answering items 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance. **Please enter only one item per box; attach additional pages as needed and check the relevant box.** Counsel must immediately file an amended Certificate of Interest if information changes. Fed. Cir. R. 47.4(b).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: 10/21/2024Signature: /s/ Adam H. GordonName: Adam H. Gordon

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities. <input checked="" type="checkbox"/> None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities. <input type="checkbox"/> None/Not Applicable
Mid Continent Steel & Wire, Inc.		Wholly owned by DEACERO USA Inc., a subsidiary of DEACERO S.A.P.I. de C.V.

☐ Additional pages attached

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

☐ None/Not Applicable

☐ Additional pages attached

The Bristol Group PLLC	Adam H. Gordon	Jennifer M. Smith
Lauren Fraid (no longer with the firm)	Benjamin J. Bay	

5. Related Cases. Provide the case titles and numbers of any case known to be pending in this court or any other court or agency that will directly affect or be directly affected by this court's decision in the pending appeal. Do not include the originating case number(s) for this case. Fed. Cir. R. 47.4(a)(5). See also Fed. Cir. R. 47.5(b).

☒ None/Not Applicable

☐ Additional pages attached

6. Organizational Victims and Bankruptcy Cases. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

☒ None/Not Applicable

☐ Additional pages attached

Defendant-Appellant Mid Continent Steel & Wire, Inc. (“Mid Continent”) respectfully opposes the Motion to Reschedule Hearing (“Motion”) filed October 18, 2024 by Appellee Oman Fasteners LLC (“Oman Fasteners”).

Oman Fasteners has requested that the Court reschedule oral argument in this appeal based on a potential scheduling challenge in appeal 23-1661. That appeal involves the same parties and oral argument in both appeals has been jointly set for November 7, 2024.

Mid Continent has filed an opposition in 23-1661 and incorporates that filing by reference.

As discussed therein, Mid Continent respectfully submits that the Court should deny the Motion and not reschedule oral argument in this appeal.

Respectfully submitted,

/s/ Adam H. Gordon
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Dated: October 21, 2024

CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limitation of Rules 28.1(e)(2) and 32(a)(7)(B) of the Federal Rules of Appellate Procedure.

This motion contains 105 words.

This motion complies with the typeface requirements Rule 32(a)(5) of the Federal Rules of Appellate Procedure, and the typestyle requirements of Rule 32(a)(6) of the Federal Rule of Appellate Procedure.

This motion has been prepared in a proportionally spaced type face using Word 2010 in Century Schoolbook 14-point font.

/s/ Adam H. Gordon

Adam H. Gordon

THE BRISTOL GROUP PLLC

*Counsel to Plaintiff-Appellee Mid
Continent Steel & Wire, Inc.*

Dated: October 21, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October, 2024, a copy of this opposition was served on the following party by operation of the Court's electronic-filing system:

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Dated: October 21, 2024